

# Arden

THEATRE CO.

40 N. 2nd Street . Philadelphia . PA 19106  
215.922.8900 p . 215.922.7011 f .  
215.922.1122 box office

[www.ardentheatre.org](http://www.ardentheatre.org)

January 2, 2015

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268  
and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner  
Rosenworcel,  
Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Arden Theatre Company, located in Philadelphia, PA, that  
provides approximately 474 performances a year to over 106,000  
audience members and education programs that serve over 8,000  
students, I write with concern about protection for our wireless  
microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that  
regularly use 50 or more wireless devices will be eligible to apply for a  
Part 74 license. I've also learned that the FCC is seeking Comment on a  
proposed rule that would prevent performing arts entities using fewer  
than 50 wireless devices from participating in the database. This would  
leave my organization without any interference protection mechanism  
from the many TV Band Devices that may soon flood the market.  
Frequency coordination with other known wireless microphone users has  
become common practice, but there is no way to coordinate with  
TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

As a mid-sized regional theatre in the city of Philadelphia we rely on wireless microphones in our children's theatre and musical theatre productions. For any given performance we use between 10 and 20 wireless microphones for approximately five months out of every year. Our current microphone inventory includes units in all three bands (VHF, Low UHF and High UHF). While we are able to tune our microphones to more than one frequency, a great number of our units are only tuneable within the frequency that is the subject of the proposed sell off. At the moment all of our wireless microphone devices are analog, however we do operate a wireless headset system in a digital range. We do own all of our equipment and vacating the proposed sell off band would require us to spend a great deal to replace that equipment. Some of this equipment was replaced not long ago in the last sell off (700 MHz) at a cost of approximately \$4,500. The reasonable life expectancy of our microphones is 10 years which means that we will be replacing perfectly good equipment well before its useful life has ended. When the 700 MHz range was vacated we only replaced equipment within that range as we could not afford to replace all of our wireless microphones. Vacating the 600 MHz will require us to spend upwards of \$30,000 to replace equipment, some of which is still very much in good working order. In order to ensure that wireless microphone users transition to new, more efficient devices we suggest a reimbursement plan that will allow small to medium arts organizations to comply without putting undue strain on operating budgets.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional

performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in cursive script, reading "Courtney Rigg". The signature is written in dark ink and is positioned above the printed name and title.

Courtney Rigg  
Production Manager  
Arden Theatre Company